

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FAN ZHANG, Individually and on Behalf of	)	No. 1:12-cv-02450
All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	Judge Charles R. Norgle, Sr.
	)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/> KATHLEEN ROSELLI, Individually and on	)	No. 1:12-cv-02460
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	Judge Charles R. Norgle, Sr.
	)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>	)	

[Caption continued on following page.]

NOTICE OF PRESENTMENT OF THE CONSTRUCTION LABORERS PENSION TRUST  
OF GREATER ST. LOUIS'S MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

DENNIS EINSPAHR, Individually and on	)	No. 1:12-cv-02547
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	Judge Charles R. Norgle, Sr.
	)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,	)	
	)	
Defendants.	)	
	)	
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JOHN PEDROW, Individually and on Behalf	)	No. 1:12-cv-02791
of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	Judge Charles R. Norgle, Sr.
	)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>		
JOHN H. COTTRELL, Individually and on	)	No. 1:12-cv-03129
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	Judge Charles R. Norgle, Sr.
	)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,	)	
	)	
Defendants.	)	
	)	
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PLEASE TAKE NOTICE THAT on Friday, June 8, 2012 at 10:30 a.m., or as soon thereafter as counsel may be heard, counsel for the Construction Laborers Pension Trust of Greater St. Louis (the "Pension Trust") shall appear before Judge Norgle or any judge sitting in his stead, in Courtroom 2341 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, IL 60604, and there and then present the Pension Trust's Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel, a copy of which is served upon you.

DATED: June 4, 2012

ROBBINS GELLER RUDMAN  
& DOWD LLP  
JAMES E. BARZ (IL Bar # 6255605)

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s/ JAMES E. BARZ  
JAMES E. BARZ

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[Proposed] Lead Counsel for Plaintiffs

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Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 4, 2012.

s/ JAMES E. BARZ

JAMES E. BARZ

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## Mailing Information for a Case 1:12-cv-02450

### Electronic Mail Notice List

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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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